

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	
-vs-	:	No. 3:23-CR-127
	:	
THOMAS TROTTA,	:	(Judge Mannion)
	:	
Defendant	:	
	:	

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**MOTION FOR EXTENTION OF TIME TO SELF SURRENDER**

AND NOW comes the Defendant, Thomas Trotta, by and through his attorney Joseph R. D'Andrea, Esq., hereby motions this Honorable Court to extend the time for self surrender and avers as follows:

1. On May 22, 2023, the United States Attorney for the Middle District of Pennsylvania filed a felony Information, charging Defendant Thomas TROTTA with one violation of 18 U.S.C. §§668 and 2, Theft of Major Artwork, Aid and Abet;
2. The Defendant plead guilty before the Honorable Malachy Mannion on July 5, 2023;
3. Due to certain circumstances, the Defendant was required to self-surrender on May 24, 2024;

4. Because of serious medical issues, the Defendant requests an extension of time to surrender;

5. The Defendant is being treated by a Wound Vac machine for an infection incurred as a result of a work-related accident;

6. The Lackawanna County Jail has indicated they have the ability to tend to Mr. Trotta's medical needs however needs ample time to prepare for these services;

7. Accordingly, the Defendant requests a self-surrender date of May 31, 2024 to accommodate the prison's need for time to prepare for his medical needs;

WHEREFORE, the Defendant respectfully request an Order extending the date of self-surrender until May 31, 2024.

Respectfully submitted,

Date: May 24, 2024

/s/ Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, Esq  
Attorney for Thomas Trotta

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**CERTIFICATE OF SERVICE**

I, Joseph R. D'Andrea, do hereby certify that this document, the foregoing Motion, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

James M. Buchanan, Esq.  
Assistant United States Attorney

And by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Thomas Trotta

Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, ESQ.  
Attorney for Thomas Trotta

Date: May 24, 2024

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CERTIFICATE OF CONCURRENCE

I, Joseph R. D'Andrea, do hereby certify that I contacted James M. Buchanan, Assistant United States Attorney, and counsel advised that he concurs in this motion.

Date: May 24, 2024

Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, ESQ.  
Attorney for Thomas Trotta